

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

United States of America
ex rel. ALEX DOE, Relator,

The State of Texas
ex rel. ALEX DOE, Relator,

The State of Louisiana
ex rel. ALEX DOE, Relator,
Plaintiffs,

V.

Planned Parenthood Federation of America, Inc.,
Planned Parenthood Gulf Coast, Inc., Planned
Parenthood of Greater Texas, Inc., Planned
Parenthood South Texas, Inc., Planned Parenthood
Cameron County, Inc., Planned Parenthood San
Antonio, Inc.,

Defendants.

CIVIL ACTION NO. 2:21-CV-
00022-Z

Date: November 1, 2022

**DEFENDANTS' NOTICE REGARDING
RELATOR'S MOTION TO COMPEL**

PRODUCTION AND APPOINTMENT OF FORENSIC EXAMINER

On October 14, 2022, Relator filed a motion to compel production and appointment of forensic examiner to conduct a review and examination of Defendants' computer systems and electronic data, and for expedited consideration. Dtk. 220. This motion sought an extreme form of relief -- appointment of a forensic examiner of Relator's choosing to inspect Defendants' systems and assess whether they had met their production obligations.

On October 18, 2022, the Court set a briefing schedule requiring Defendants to file their response on or before Wednesday, October 26, 2022 and Relator to file their reply on or before

Friday, October 31, 2022. Dkt. 225. Defendants filed their responses on Wednesday, October 26, Dkts. 236, 237, and Relator filed their reply on Monday, October 31, 2022, Dkt. 242.

Relator for the first time in their Reply sought new relief that was not sought in their opening brief. Dkt. 242 at 8-11 (“Alternative to Proposed Forensic Examination Process”). Defendants intend to file a motion for leave to file sur-reply and proposed sur-reply to address Relator’s new proposal no later than November 2, 2022, and respectfully request that the Court defer ruling on Relator’s motion until Defendants have an opportunity to file the motion and proposed sur-reply.

Dated: November 1, 2022

Respectfully submitted,

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LLP

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November 1, 2022

CERTIFICATE OF SERVICE

I hereby certify that on November 1, 2022, the foregoing document was electronically filed with the Clerk of Court using CM/ECF.

/s/ Tirzah S. Lollar
Tirzah S. Lollar